

EXHIBIT 31

From: [Christina V. Rayburn](#)
To: [Mike Carroll](#); [Spencer Hosie](#); [Thomas King](#); [Amazon/MasterObjects \[INT\]](#)
Cc: [Diane Rice](#); [Darrell Atkinson](#); [Jerry Shaw](#)
Subject: RE: MasterObjects, Inc. v. Amazon.com, Inc.
Date: Wednesday, February 16, 2022 8:13:29 PM

Given the confirmation that the only thing redacted from the emails was the print date, please reproduce them in native form and without redaction, as there is no basis to redact the date. Spencer, your filing to the Court asserted that "Mr. Nelson found an old laptop at his house....On this laptop, Mr. Nelson found numerous emails and letters exchanged with Mr. Chatterjee...he sent most of these emails through his personal email account." We did not have those emails and it now appears that there are no such emails from Mr. Nelson's personal account.

We are not waiving privilege nor do we see any basis for your request.

The rest of your accusations and rhetoric do not merit a response.

Best,

Christy

Christina V. Rayburn
D: 949.356.6412

From: Mike Carroll <mcarroll@hosiellaw.com>
Sent: Wednesday, February 16, 2022 4:50 PM
To: Spencer Hosie <shosie@hosiellaw.com>; Christina V. Rayburn <crayburn@hueston.com>; Thomas King <tking@hueston.com>; Amazon/MasterObjects [INT] <AmazonMasterObjects@hueston.com>
Cc: Diane Rice <drice@hosiellaw.com>; Darrell Atkinson <datkinson@hosiellaw.com>; Jerry Shaw <jshaw@hosiellaw.com>
Subject: RE: MasterObjects, Inc. v. Amazon.com, Inc.

Correct, I redacted the Saturday print date at the top of the email. That was the only redaction.

From: Spencer Hosie <shosie@hosiellaw.com>
Sent: Wednesday, February 16, 2022 4:43 PM
To: Christina V. Rayburn <crayburn@hueston.com>; Mike Carroll <mcarroll@hosiellaw.com>; Thomas King <tking@hueston.com>; Amazon/MasterObjects [INT] <AmazonMasterObjects@hueston.com>
Cc: Diane Rice <drice@hosiellaw.com>; Darrell Atkinson <datkinson@hosiellaw.com>; Jerry Shaw <jshaw@hosiellaw.com>
Subject: Re: MasterObjects, Inc. v. Amazon.com, Inc.

Yes from his old laptop. Only thing redacted was a Saturday print date, correct Mike?

You really thk we made these up? Hh needs to be held to account.

Will you share the 95 Neel to Devore and the converse emails? These will prove that our account is exactly right. If they helped you, you would mail them to me asap, obviously.

You, and I mean YOU as lead counsel, filed very public fraud charges against opposing counsel

without even reading your client's own documents directly on point.

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From: Christina V. Rayburn <crayburn@hueston.com>
Sent: Wednesday, February 16, 2022 5:33:54 PM
To: Mike Carroll <mcarroll@hosiellaw.com>; Thomas King <tking@hueston.com>; Amazon/MasterObjects [INT] <AmazonMasterObjects@hueston.com>
Cc: Spencer Hosie <shosie@hosiellaw.com>; Diane Rice <drice@hosiellaw.com>; Darrell Atkinson <datkinson@hosiellaw.com>; Jerry Shaw <jshaw@hosiellaw.com>
Subject: RE: MasterObjects, Inc. v. Amazon.com, Inc.

Mike and counsel,

Thank you for this production. It appears that MO_049740 has been redacted, but with a white redaction box. Can you please confirm that that is the case, and if so, confirm that you will log the redaction as soon as possible? In addition, can you please confirm whether the documents in this production came from Will Nelson's personal laptop? We had understood that would be the case, but we note that the Production Cover letter states that the source of the documents is "Hosie Rise," the location of the documents is "Hosie Rice emails," and the person conducting search is "Michael Carroll, Senior Paralegal." Finally, pursuant to Federal Rule of Civil Procedure 34(b)(2)(E), can you please provide the two non-redacted documents in their native form, and the redacted one in a form that preserves its metadata?

Best,
Christy

Christina V. Rayburn

HUESTON HENNIGAN LLP

D: 949.356.6412
crayburn@hueston.com
[Biography](#)

From: Mike Carroll <mcarroll@hosiellaw.com>
Sent: Wednesday, February 16, 2022 1:21 PM
To: Christina V. Rayburn <crayburn@hueston.com>; Thomas King <tking@hueston.com>; Amazon/MasterObjects [INT] <AmazonMasterObjects@hueston.com>
Cc: Spencer Hosie <shosie@hosiellaw.com>; Diane Rice <drice@hosiellaw.com>; Darrell Atkinson <datkinson@hosiellaw.com>; Jerry Shaw <jshaw@hosiellaw.com>
Subject: MasterObjects, Inc. v. Amazon.com, Inc.

Counsel:

Please find the attached production cover letter. MasterObjects' production is available for

download at: <https://www.dropbox.com/sh/pb1cllrk34gnhq/AACVO1112oy6TLs4yv1YP1lba?dl=0>

--Mike Carroll
Senior Paralegal
Hosie Rice LLP

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